

**VIKRAM P. GROVER d/b/a
“IX ADVISORS” a/k/a “IXA,”**

Plaintiff,

v.

**NET SAVINGS LINK, INC., a
Colorado corporation and formerly
organized as a Nevada corporation,
WILTON GROUP, LIMITED, as
registered in the Isle of Man, U.K.,
WILTON UK (GROUP), LIMITED, as
registered in England and Wales, U.K.,
CHINA FOOD AND BEVERAGE CO.,
a Colorado corporation, and
JAMES A. TILTON,**

Defendants.

AMENDED JOINT STATUS REPORT

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I. STATUS OF DISCOVERY

A. As this Court is aware, all of the Corporate Defendants have been defaulted and none have engaged a successor attorney. The deadline for engagement of counsel by the Corporate Defendants, scheduled for October 10, 2023, has since passed. The hearing on Plaintiff's Motion for Default Judgment is scheduled for December 5, 2023.

B. Per the Minute Entry dated October 13, 2023, all of Plaintiff's Request for Admissions have been deemed admitted. Defendant has additionally been ordered to pay \$2,000 in attorney's fees to Plaintiff, which to this date has not been paid.

C. Per the Minute Entry dated October 18, 2023, Defendant was given until October 30, 2023 to produce Plaintiff's requested documents. Written discovery remains outstanding as of the date of this filing. While failing to comply with the deadline for responses and production of documents on or before October 30, 2023, Defendant has produced limited requested documents and certain answers to Plaintiff's interrogatories. Defendant James Tilton served his most recent responses to written discovery this morning, on December 5, 2023, but has acknowledged that he has not completed all written discovery.

D. On December 1, 2023, Plaintiff delivered a Re-Notice of Deposition to Defendant, as originally noticed in June 2023. Such deposition is currently scheduled for December 13, 2023.

E. On December 3, 2023, the Plaintiff's counsel emailed James Tilton and demanded that the Defendant pay the Court-ordered attorney's fees of \$2,000.00, or Mr. Grover would be forced to file a Motion for relief from the Court. Mr. Tilton has responded and claimed that he and the Corporate Defendants do not have the funds to pay the \$2,000.00 and that such payment therefore would not be paid. The Plaintiff intends to seek relief as to the same.

F. Defendant James Tilton has not served Plaintiff with any discovery requests as of this date, and the deadline for the same has passed.

G. Defendant James Tilton's further comments are verbatim below:

"Mr. Giordano- Please see my comments to the draft you sent me yesterday.

C. I don't think I can do more on the interrogatories. I believe it is enough to handle the case properly.

I completed every admission.

I sent the Wilton emails and attachments. I have completed the Grover emails and attachments and will send them to you after this email.

After that, I will send the Baritz emails.

I believe that should suffice to adjudicate this case. However, I will continue on with the document list.

D. I will be available for the deposition on the date and time requested. My apologies for the late confirmation.

E. I replied to this a few minutes ago.

F. As I am not an attorney, this is all quite difficult for me. I believe the only documents that I require from plaintiff is even a single email evidencing that I had copies of the consulting, employment and non-circumvention agreements prior to February 2019. Nothing else really matters. Next, I will show that plaintiff knew about Baritz transferring his A control shares to me before he did so and plaintiff never objected.

As for the rest, I don't have any objections of comments. However, I probably don't fully understand the content."

II. PROPOSED BRIEFING SCHEDULE OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

A. Defendant James Tilton and Counsel for Plaintiff proposes the following briefing schedule for Plaintiff's Motion for Summary Judgment be set as follows, or set promptly thereafter, as may be convenient for this Court:

1. PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT and accompanying memorandum of law to be completed and filed by January 31, 2024
2. DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT to be completed and filed by February 21, 2024
3. PLAINTIFF'S REPLY MEMORANDUM IN SUPPORT OF HIS MOTION FOR SUMMARY JUDGMENT to be completed and filed by February 28, 2024.
4. HEARING ON THE PLAINTIFF'S MOTION, in or about March 2024 or as scheduled in the discretion of this Court.

III. PROPOSED BRIEFING SCHEDULE OF PRETRIAL MOTIONS *IN LIMINE* AND TRIAL SCHEDULING

Subject to the Court's convenience, scheduling and Orders on the Plaintiff's anticipated Motion *in Limine* and other Trial Motions, Defendant James Tilton and the Plaintiff propose that the briefing schedule for Motions be set as follows, or set promptly thereafter, as may be convenient for this Court.

1. MOTIONS *IN LIMINE* and other Trial Motions and accompanying memorandum of law to be completed and filed by April 1, 2024
2. OPPOSITIONS TO MOTION *IN LIMINE* and other Trial Motions to be completed and filed by April 15, 2024
3. REPLY MEMORANDA TO MOTIONS *IN LIMINE* and other Trial Motions to be completed and filed by April 22, 2024.
4. HEARING ON THE MOTION *IN LIMINE* and other Trial Motions, and FINAL TRIAL CONFERENCE on or about April 29, 2024, or at a mutually convenient time for this Court.

5. FINAL TRIAL CONFERENCE on or about May 3, 2024, or at such time as convenient the Court, parties and counsel.
6. TRIAL, commencing on or about May 6, 2024, or at such time as convenient the Court, parties and counsel.

Dated: December 5, 2023

Respectfully submitted,
PLAINTIFF, Vikram P. Grover,

By his Attorneys,

/s/ Philip M. Giordano
Philip M. Giordano, Esq. (admitted *pro hac vice*)
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DEFENDANT, James Tilton, pro se,

/s/ James A. Tilton (with authorization)
James A Tilton, *pro se*
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CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on this 5th day of December, 2023, I caused to be served a true and correct copy of the Parties' Fifth Joint Status Report, as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record.

Dated: December 5, 2023

/s/ Philip M. Giordano
Philip M. Giordano